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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 24, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Re: Reply Comments in CC Docket 92-76

Dear Ms. Searcy,

The Irrigation Association has recently become aware of a service being proposed to the FCC by applicants for Non-Voice, Non-Geostationary Mobile Satellite Service ("NVNG MSS"). These applicants propose communications services that, if available, would greatly improve the irrigation and agricultural industries operating efficiencies.

The Irrigation Association strongly endorses the comment of dbX Corporation ("dbX") that rules for implementation of the NVNG MSS should be designed to promote multiple service providers and competition. Multiple service providers will help ensure three important goals of users are met by the introduction of NVNG MSS service: price competition, ongoing technological and service innovation and flexibility on the part of service providers.

FCC licensed monopolies or duopolies (e.g., cable and cellular) have not resulted in price competition for service rates. In addition, multiple service providers will be incented to improve their technology and introduce innovation in order to differentiate service offerings from others. Finally, a competitive marketplace where the customer had multiple service providers to choose from will result in greater flexibility on the part of the service providers to accommodate the needs of specific customers.

The Irrigation Association believes the Commission must specifically address how multiple entry will be implemented in order to ensure the development of a competitive marketplace. The Irrigation Association remains extremely concerned that the Commission's proposed rules do not incorporate specific protections to

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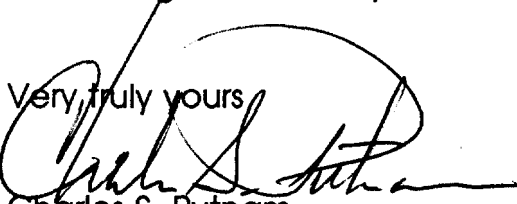
ensure that multiple entry is sustained in practice.

The irrigation and agricultural industries suffer from the inability to communicate in a cost effective manner. The irrigation and agricultural industries are greatly in need of a full featured, two-way communications service in an affordable price range. The current communications systems provide limited services at costly rates.

The availability of services, such as those proposed by the NVNG MSS applicants, could solve many of the problems currently facing the irrigation and agricultural industries.

Improved communications services will increase the efficiencies in the irrigation and agricultural industries which will be beneficial to the general economy. For these reasons, the Irrigation Association strongly encourages the FCC to consider the communications needs of the irrigation and agricultural industries in the licensing of new services. Thank you for the opportunity to express these concerns for the irrigation industry.

Very truly yours



Charles S. Putnam
Executive Director